

JOSEPH SAVERI
LAW FIRM

555 MONTGOMERY STREET
SUITE 1210
SAN FRANCISCO, CA 94111

TEL 415.500.6800
FAX 415.395.9940

August 24, 2016

Via Electronic Mail

Stacey Grigsby
Boies, Schiller & Flexner LLP
5301 Wisconsin Ave. NW
Washington, DC 20015
sgrigsby@bsflp.com

Re: *Le et al. v. Zuffa, LLC*, Case No. 2:15-cv-01045-RFB-PAL (D. Nev.)

Dear Stacey,

I write in response to your letter dated August 19, 2016. The documents you identified are neither privileged communications nor attorney work product. Accordingly, Plaintiffs intend to file a motion to challenge Zuffa's assertion of work product protection for ZFL-0557588, ZFL-1824835 and ZFL-1824837. Pursuant to Section 11 of the Revised Stipulation and Protective Order (Dkt. 217) we have sequestered these documents so that no attorney can access them, but have retained a copy of each for the purpose of challenging the designations with the Court.

Sincerely,



Kevin E. Rayhill